

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
FIRST GUARANTY MORTGAGE)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	

**SECOND AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JUNE 29, 2023 AT 2:30 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT IN THE U.S. BANKRUPTCY
COURT, 824 NORTH MARKET STREET, 3RD FLOOR, COURTROOM 7,
WILMINGTON, DELAWARE 19801**

This hearing will be conducted in-person. All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom. Participation at the in-person court proceeding using Zoom is allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; or (iii) other extenuating circumstances as determined by Judge Goldblatt. All participants over Zoom must register in advance. Please register by June 28, 2023 at 4:00 p.m.

**COURTCALL WILL NOT BE USED FOR THIS HEARING.
Please use the following link to register for this hearing:**

https://debuscourts.zoomgov.com/meeting/register/vJItOqgpz0vGycxCX2YBjRZOISYJ6_tWNc

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

² Amended items are indicated in bold.

I. CONTESTED MATTERS GOING FORWARD

1. *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed December 13, 2022) [Docket No. [711](#)]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 24, 2023) [Docket No. [762](#)]

Related Documents

- A. Notice of Hearing on Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 10, 2023) [Docket No. [749](#)]
- B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]

Status: This matter is going forward.

2. *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed December 13, 2022) [Docket No. [712](#)]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received:

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [761](#)]
- B. Objection of B2 FIE XI LC AND LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [763](#)]
- C. Liquidating Trustee's Supplemental Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer

Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed June 21, 2023) [Docket No. [835](#)]

Related Documents:

- A. Notice of Hearing on *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 10, 2023) [Docket No. [750](#)]
- B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]

Status: This matter is going forward.

- 3. *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 15, 2023) [Docket No. [833](#)]

Response Deadline: June 22, 2023 at 4:00 p.m. (Extended to June 23, 2023 as to the Liquidating Trustee and the Lenders)

Responses Received:

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. [843](#)]
- B. Objection of B2FIE XI LLC and LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. [844](#)]

Status: This matter is going forward

- 4. Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 15, 2023) [Docket No. [834](#)]

Response Deadline: June 22, 2023 at 4:00 p.m. (Extended to June 26, 2023 at 5:00 p.m. as to Servis One, Inc., d/b/a BSI Financial Services, June 27, 2023 at 4:00 p.m. as to the Federal Home Loan Mortgage Corporation, and June 28, 2023 at 12:00 p.m. as to the Department of Justice)

Responses Received:

- A. Objection of the Federal National Mortgage Association to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 21, 2023) [D.I. [840](#)]
- B. Servis One, Inc., D/B/A BSI Financial Services's Objection to the Liquidating Trustee's Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 21, 2023) [D.I. [846](#)]
- C. Objection of Federal Home Loan Mortgage Corporation to the Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 27, 2023) [D.I. [850](#)]

Related Documents:

- A. Liquidating Trustee's Witness and Exhibit List for Hearing on June 29, 2023 at 2:30 P.M. (ET) (Filed June 27, 2023) [D.I. [849](#)]
- B. **Motion for Leave to File a Late Reply in Support of Motion for Order Authorizing the Destruction of Certain Records Pursuant to Bankruptcy Code Sections 105 and 363 (Filed June 28, 2023) [D.I. [857](#)]**
- C. **Liquidating Trustee's Amended Witness and Exhibit List for Hearing on June 29, 2023 at 2:30 P.M. (ET) (Filed June 29, 2023) [D.I. [858](#)]**

Status: This matter is going forward.

Dated: June 29, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcaloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street, #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for Debtors and Liquidating Trustee